

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

J.G.,	)	
	)	
Plaintiff,	)	
	)	Civil Action File
v.	)	No. 1:20-cv-05233-SEG
	)	
NORTHBROOK INDUSTRIES, INC.,	)	
d/b/a UNITED INN AND SUITES,	)	
	)	
Defendant.	)	

**DEFENDANT’S MOTION FOR LEAVE TO FILE  
FRE 412 MOTION UNDER SEAL  
AND MEMORANDUM OF LAW IN SUPPORT**

COMES NOW Defendant Northbrook Industries, Inc., d/b/a United Inn and Suites (“Northbrook”), and, pursuant to Rule 412(c)(2) of the Federal Rules of Evidence, files this motion for leave to file under seal Defendant’s FRE 412 Motion and Memorandum of Law in Support.

In support of this motion, Northbrook states that it intends to offer at the trial of this case certain evidence of Plaintiff’s other sexual behavior. Rule 412(c) of the Federal Rules of Evidence requires the filing of a motion before such evidence will be admitted. Although Northbrook does not concede that the evidence in this case is subject to Rule 412, Northbrook intends to file a Rule 412 motion out of an abundance of caution. Rule 412(c)(2) requires that such motion “must be and

remain sealed.” Accordingly, Northbrook seeks leave of Court to file its Rule 412 motion under seal. A proposed order granting the motion is provided.

**L.R. 7.1(D) CERTIFICATION**

The undersigned counsel hereby certifies that this Motion has been prepared in Times New Roman (14 point), which are font and point selections approved by the Court in L.R. 5.1(C).

Respectfully submitted,

/s/ Dana M. Richens  
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Northbrook Industries, Inc.  
d/b/a United Inn and Suites

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this date served all parties with the within and foregoing **DEFENDANT’S MOTION FOR LEAVE TO FILE FRE 412 MOTION UNDER SEAL AND MEMORANDUM OF LAW IN SUPPORT** via the Court’s CM/ECF electronic filing system, which will automatically provide notice of filing constituting service to all counsel of record.

This 14th day of March, 2025.

/s/ Dana M. Richens